

REMARKS

Claims 1-36 are all the claims pending in the application. Claims 6-8, 18-20, and 30-32 were withdrawn from consideration based on the previously submitted Species Election, and as such claims 6-8, 18-20, and 30-32 are canceled herein without prejudice or disclaimer. Claims 1-5, 11, 13-17, 23, 25-29, and 35 stand rejected on prior art grounds. Claims 9, 10, 12, 21, 22, 24, 33, 34, and 36 are objected to as being dependent upon a rejected base claim, but contain allowable subject matter. Additionally, the abstract is objected to. Claims 1, 4, 9, 10, 12, 13, 16, 21, 22, 24, 25, 28, 33, 34, and 36 as well as the abstract are amended herein. Applicants respectfully traverse these rejections based on the following discussion.

I. The Objection to the Abstract

Based on the objection to the abstract, the Applicants herein amend the abstract thereby providing proper language, format, and scope to the abstract. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the objections.

II. The Prior Art Rejections

Claims 1-5, 1, 13-17, 23, 25-39 and 35 stand rejected under 35 U.S.C. §102(a) as being anticipated by Huang (U.S. Patent No. 6,175,663). Applicants respectfully acknowledge that claims 9-10, 12, 21-22, 24, 33-34 and 36 would be allowable if rewritten in independent form. Applicants respectfully traverse these rejections based on the following discussion.

Huang teaches a system having particular applications to image archives and reediting. Given an image of an article having graphic objects including texts and pictures, the system in Huang first distinguishes graphic objects from the background by segmenting the image so as to

produce an object image comprising a foreground, wherein the foreground corresponds to the graphic objects in the image. With respect to the foreground, the system in Huang "repaints" those spaces previously occupied by the graphic objects, referred to as object spaces, with the background color in the image as such the background continuity is preserved when the graphic objects are rendered and subsequently superimposed onto the repainted background. To account for various backgrounds, the system in Huang uses a point-wise patching approach followed by a one-dimensional patching approach if the object spaces contain two different colors. In addition, a two-dimensional patching approach is implemented to account for printing effects such as half-toning and mosaic patterns.

The claimed invention, as provided in amended independent claims 1, 13, and 25 contain features, which are patentably distinguishable from the prior art reference of record, namely Huang. Specifically, claims 1, 13, and 25 generally provide "...assigning a color value to an exposed pixel equal to the color intensity value of a mirror-image pixel of said exposed pixel." As indicated on page 4 of the Office Action, this feature is not taught or suggested in Huang. In particular, these features are taught in original claims 9, 21, and 33, which the Office Action indicates as containing allowable subject matter. As such, Applicants have incorporated these patentable features into independent claims 1, 13, and 25 to place the application in condition for immediate allowance.

In view of the foregoing, the Applicants respectfully submit that the cited prior art reference, Huang does not teach or suggest the features defined by amended independent claims 1, 13, and 25 and as such, claims 1, 13, and 25 are patentable over Huang. Further, dependent claims 2-5, 9-12, 14-17, 21-24, 26-29, and 33-36 are similarly patentable over Huang, not only by virtue of their dependency from patentable independent claims, respectively, but also by

virtue of the additional features of the invention they define. Moreover, the Applicants note that all claims are properly supported in the specification and accompanying drawings, and no new matter is being added. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections.

III. Formal Matters and Conclusion

With respect to the objection to the abstract and with respect to the rejections to the claims, the abstract and claims have been amended, above, to overcome these objections/rejections. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the objection to the abstract and the rejections to the claims.

In view of the foregoing, Applicants submit that claims 1-5, 9-17, 21-29, and 33-36, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary. Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0441.

Respectfully submitted,

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